A New Accountability Model for Alternative K–12 Schools

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Key Points

- Virtual schools and alternative K–12 education models are typically evaluated using traditional accountability metrics despite having distinct student populations and educational missions.
- A new accountability model is needed for these schools that provides regulators with the data they need to ensure a baseline level of education and families with information that will help them compare alternative education options.
- Metrics for alternative school accountability should be outcomes-based, adaptive to schools' particular missions, and audited to guard against manipulation.

As full-time virtual learning moved from the fringe to the mainstream in mid-March 2020, onlookers expressed concerns about access for learners and accountability for the learning itself.

Since at least 2015—when the widely cited National Study of Online Charter Schools by the Center for Research on Educational Outcomes (CREDO) at Stanford University, Mathematica Policy Research, and the Center for Reinventing Public Education found that students enrolled in full-time, virtual charter schools made, on average, far less progress than their counterparts in traditional schools did[1]—educators of all stripes have had significant concerns around the quality of these offerings.

These concerns haven't applied only to full-time virtual schools, however. Alternative schools that serve students who have dropped out or transferred from traditional schools—and often serve as schools of last resort—have historically struggled to show the value they add to students. They have also struggled to allow families and regulators to make sound judgments around their value. Although supporters suggest that these schools are crucial because they provide smaller classes, more flexible schedules, and more counseling, the few studies that have looked specifically at alternative schools have documented significant quality concerns, low graduation rates, and underfunding.[2]

The question for regulators, families, and the schools themselves is whether these alternative schools have poor outcomes because of the students they serve and their resources or because they are poorly serving these students. The reality on the ground is surely mixed. But the data states provide—coupled with the diversity of the alternative school sector and the high proportion of at-risk students it serves—make it difficult to disentangle.[3]

This report argues that alternative schools need a new set of standard metrics to help families and policymakers gauge their quality. These metrics should be based on student outcomes—not inputs. And they should allow schools some latitude to select the measurements most applicable to their mission. However, those measurements must also have enough in common that they give prospective families a clear view of whether a school is the right fit for them and policymakers greater clarity as to whether the school is serving its students well and fulfilling its mission.

Current Efforts Around Alternative and Virtual Education Accountability Are Inadequate

A few states have tried to address concerns about the quality of alternative schools. A review of 38 states' Every Student Succeeds Act plans by the American Youth Policy Forum, for instance, found that eight states' plans distinguish between traditional and alternative schools by adding intervention or support strategies, using GED rates or growth rates on assessments instead of proficiency on traditional end-of-year tests, or modifying accountability measures for alternative schools. Mostly, however, alternative schools are evaluated using the same metrics as traditional schools despite serving a different population.[4]

Alternative schools themselves have attempted to rewrite the narrative around alternative education by developing their own accountability frameworks. In Massachusetts, for example, the few alternative charter schools that exist and serve nontraditional students have created an alternative set of measures to monitor their quality, as they contend that the traditional metrics (e.g., summative test scores and on-time graduation rates) don't make sense to measure the outcomes for students who enter the schools overage and undercredited.[5] One of these schools, the Boston Day and Evening Academy, has a set of measures related to the execution of its mission—as opposed to its outcomes—that monitors the extent to which its school culture is "safe and equitable," learning is competency-based, assessments are "student-centered," and postgraduate planning is available.[6]

Full-time virtual charter schools have similarly denounced the methodology behind research at centers like CREDO by suggesting that it paints a flawed picture of their schools' performance.[7] Like the Boston Day and Evening Academy, they correctly claim that traditional accountability metrics don't capture the circumstances in which their students enroll and therefore do not capture the value they provide.

To illustrate one such situation that virtual schools might confront: Imagine a school serving students entering at a fifth-grade age but with second-grade math abilities. The school chooses to serve the students where their learning needs are, not where the traditional system thinks they should be. Suppose that by the end of the year the students are performing math at a fourth-grade level. This would seem a remarkable success, but the school would likely not get credit for it under most accountability regimes today, as the tests focus narrowly on grade-level material as opposed to understanding the starting and ending points of a given student. This situation of course also applies to traditional schools, but a striking number of the students enrolled in alternative arrangements falls under patterns like this one.

Why There Must Be a New Framework to Measure Quality

Throwing darts at existing metrics and studies isn't enough. Nor are one-off accountability frameworks like the one Boston Day and Evening created, which fail to provide not only families with the information they need to make judgments *between* alternative schools but also regulators with the data they need to ensure a baseline level of education. Even current state-based frameworks that acknowledge the difference between alternative and traditional schools lack a common philosophy for representing student outcomes.

Instead, a uniform framework that allows families and regulators to make judgments around schools' relative quality is needed so they can make decisions that will ultimately hold these schools accountable. Such a new model to measure quality should not focus on a school's activities—such as the time spent learning, who works with students, the use of "best practices," and the recruitment of students that fit their charter. (This is what alternative schools that have worked with their state to produce alternative accountability frameworks have historically done.)[8] New transparency models should instead focus on outcomes relative to the students each school serves—and thus focus on objectives tailored to the school's mission—with clear data that are audited by an independent third party.

Focusing on inputs locks institutions into a fixed way of doing things and inhibits their ability to innovate. Focusing on outcomes, however, encourages continuous improvement toward an overall set of goals—in this case, goals around student success. And it gives parents and policymakers a baseline to evaluate the schools.

Not dictating input-based measures for institutions to follow—such as seat-time measures, class-size numbers and configurations, and the credentials that teachers must hold—allows for novel and unconventional school models that parents can choose in accordance with their preferences and needs, and it will allow policymakers to see whether students are excelling in line with the public interest. Although reporting on inputs can help parents find a school that matches a certain educational philosophy and therefore has value as a tool for families, it falls short of helping all stakeholders understand the outcomes from those models so they can make decisions around enrolling and regulatory approval.

A Path Forward

The Education Quality Outcomes Standards Board,[9] a nonprofit I helped found, has put forth a framework that, although focused on postsecondary education, can begin to offer a set of standards for measuring different kinds of outcomes based on institution type at the K–12 level. The framework calls for a two-pronged approach. First, it establishes standards in five different elements[10]: learning outcomes, program completion, placement upon leaving, postgraduation earnings, and student satisfaction. Not all these elements will apply to all schools, as some are a better fit for schools that have a career and technical focus and serve older students. In other words, a school's mission and who it serves would shift the indicators in the standards used. Although no system can capture perfectly every dimension of an education program's quality, these standards allow institutions to report outcomes through the lens of the students. To that end, the standards allow schools to report on a range of near- and medium-term outcomes related to learning, completion, placement, earnings, and satisfaction that each program could claim to provide.

Second, an auditor would conduct an examination to provide assurance that the outcomes reported were collected and reported in accordance with the standards spelled out in the Education Quality Outcomes Standards Board framework and that there is no evidence of manipulation. The intention, ultimately, is that the schools report data on the claims they make about the value they contribute to students and society.

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If a program claims to provide a career benefit—as many career and technical schools do—that school would measure its benefit using such indicators as placement in jobs, earnings, and student passing rates on relevant certifications, which would allow stakeholders to compare the program to alternative options. Although different schools might report different sets of outcomes in line with the value they provide students and their programs' missions, a functional quality assurance system should rely on multiple measures of results.

Five Quality Assurance Elements for Alternative Schools. The next section summarizes how a K–12 alternative school could think about reporting outcomes in each of the five categories. All these measures should be broken down by various subgroups that are demographic and capture student and parent intention in enrolling and the academic level on entry, as discussed below.

Learning Outcomes. In addition to having students sit for state-mandated assessments, each school would choose one or more assessments—whether traditional, objective assessments; portfolios of work; measures of social or emotional gains; or rubric-based grading of more subjective, performance-based assessments—that are valid, reliable, and appropriate for the program of study. Schools with common missions and purposes would either choose the same set of assessments, to allow parents and policymakers to make valid comparisons, or create ways to compare locally offered assessments by giving subsets of their student population a sample of questions from a common assessment.

All programs would be required to administer pre- and post-assessments to students so they can report individual student growth, and those assessments must be taken under identical conditions. The assessments would test items below and above grade level so they accurately capture each individual student's starting point and growth. Pre-assessments upon enrollment are crucial and should be required, as district schools where students were formerly enrolled often don't transfer students' academic records to their new school.

Ideally, the schools would use not just norm-referenced tests,[11] which measure growth relative to other students, but also criterion-referenced growth assessments, which measure performance relative to a specific set of standards (like those that i-Ready offers[12]) to report the results in ways that are transparent, the public can understand, and capture raw results around student progression. Statisticians can then use the raw results to make cohort-based comparisons to inform various rankings and comparisons between schools or to make policy decisions. In addition, alternative schools focused on serving students who have dealt with trauma should administer up-front risk assessments and survey measures around social-emotional learning, school climate, and student relationships.

Finally, instead of assuming that average daily attendance and other seat-time-based measures correlate to learning, to the extent schools must continue these measurements to receive funds, they should seek waivers so they can shift to engagement measures that track student progression. These could include the use of and completion or submission of assignments.

Program Completion. Although completion is a measure that can be easily manipulated—as it's relatively easy to print a diploma for a student compared to ensuring they've learned, and it falls under the category of an output more than an outcome—it's useful for parents trying to understand the likelihood of their child successfully graduating from a given school. One adjustment to make to measure completion is to survey students and parents upon enrollment to understand their intention in enrolling.

Because many families enroll their children in alternative settings out of a desire to help them catch up and then return to traditional school; temporarily escape a bullying situation, a bad teacher, or a bad year; provide a stopgap during a family move between districts or states; or avoid poor remote learning (as we saw this past year),[13] it's helpful to allow those families to understand whether the school is working for learners who have similar intentions. Do the incoming students intend to stay for a short time to transition to another school? Do they intend to stay for only the year? Do they intend to stay through graduation? In turn, these students could then be tracked by whether they successfully complete the term they intended upon enrollment. These reasons for enrolling can change, of course, but it's helpful to create cohorts based on entering intentions so that parents can make decisions based on families with similar profiles.

Placement upon Leaving. Schools should report students' placement information upon exiting their program. If the students left early, did they transfer to another school? Did they drop out? If the students graduated, where did they go next? For high schools, understanding where students went after leaving—for example, to a job, a two-year or four-year program, or a shorter-term training program—is helpful information for accountability to work. This would assure prospective parents and students and policymakers that attending the school helped students achieve their goals, whatever those might be.

Earnings After Graduation. For most schools, earnings after graduation will not be a relevant metric, but for schools with a career and technical education perspective, they might be. This measure would capture students' salaries upon leaving the program and entering the workforce. In addition, for students graduating from career-focused schools, policymakers could tie earnings data over time to those schools to build longitudinal views of how the schools prepared students for not just their first job but their career.

Satisfaction and Confirmation of Purpose. All programs would be required to understand whether the school's mission is consistent with why parents and students chose the school and then to measure whether parents and students were satisfied with the experience retrospectively. For the former objective, the key will be to understand the parents' and students' goals when they enroll.

This information is vital because many virtual schools, for example, have argued that they have low completion rates or low test-taking rates because their student population has a different set of goals when they enroll, which their internal data support. When that's the case, it's important to capture upon intake, not at the end of a student's experience in a program.

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The above five categories can then be used alongside demographic classification and entering academic level (e.g., students who are more than 48 months behind academically) to disaggregate outcomes and measure success for each group based on whether they attained their entering goal. Students should also be surveyed after they leave to understand their satisfaction. This measure should be based on former students answering the following question on a 10-point scale: "Knowing what you know now, would you choose to repeat your experience here?"[14]

Although many programs are fond of asking such questions with a net promoter score while students are enrolled, this measurement has two key challenges. First, providers can effectively manipulate students' answers by providing perks around the time the survey is documented—be that pizza parties or good grades. Second, because the quality of an education can be relatively opaque to learners, it can be hard for students to know whether their education will pay off in the medium or long term or how it compares to other options in which they might have enrolled.

Consequently, this question is better asked after students have left the program for some length of time and can reflect with the benefit of hindsight and more context on the quality of their experience. One factor with which policymakers and researchers will need to grapple is how to think about response rate in these surveys and, in particular, how to judge a low response rate. For example, if only 10 percent of alumni respond to a survey and report high satisfaction, is that because only those who were enthusiastic about the experience decided to reply? Or is it truly representative of the broader student experience?

As an interim measure, schools could choose to also administer school climate surveys, which providers such as Panorama Education offer,[15] to gain a more current measure of the schooling experience.

Data Should Be Audited. All the measures on which a school collects data and reports outcomes consistent with a set of standards should be audited. Auditors should make sure providers don't manipulate the test conditions under which students take exams, for example, and ensure that work a school represents as a given student's was in fact done by that student. Auditors should not only look at the data a school produces but also do independent verifications with students and parents annually to provide assurance that the outcomes measured are accurate.

With such an audit process in place, it's important to avoid conflicts of interest between schools and the auditor, which could range from traditional accounting firms that conduct audits in other areas, such as compliance with environmental standards, to nonprofit entities trained in the Education Quality Outcomes Standards. To avoid such conflicts, education can look to the rules governing financial auditing of publicly traded companies as a way forward.

How It Might Look

Against this framework, a full-time virtual school might measure the following set of indicators, which regulators and others compiling rankings could choose to weight differently.

Learning Outcomes

- Have 80-plus percent of learners take state-mandated assessments,
- Measure individual student learning using i-Ready assessments,
- Measure student social-emotional learning growth through up-front risk assessment and periodic surveys, and
- Use individual students' project portfolios to assess mastery and progress against competencies through the use of Mastery Transcript Consortium,[16] a nonprofit that offers an alternative framework to document student learning in high school.

Completion

- Measure the annual percentage that successfully completes the desired outcome based on student intention.

Satisfaction

- Administer school climate surveys,
- Gather retrospective student satisfaction responses, and
- Ask for parent satisfaction responses (same format as the student satisfaction question).

Specifically, the Sarbanes-Oxley regulatory regime, which Congress passed and President George W. Bush signed in 2002 to help protect investors from fraudulent financial reporting, has set the gold standard for auditing claims of performance.[17] Although evidence suggests the Sarbanes-Oxley Act has stifled small businesses and innovation because of its reporting requirements (and associated costs),[18] the reasons for the protections it has established are, in certain key respects, similar to the reasons for protections involving auditing educational institutions' performance claims. As such, its rigorous set of standards for monitoring and reporting on an entity's claims around outcomes seems appropriate for the education sector.

Three key principles from the Sarbanes-Oxley law ought to apply. First, the entity that evaluates an educational program's claims about outcomes must be independent of the program, which means that the entities must not have a deeper economic affiliation. There must not be a vendor or consulting relationship between the auditor and the school, and the auditor must not have a direct economic stake in the school. Membership groups, in which schools pay to join (akin to accreditors), are likewise not in a position to conduct audits. And there must be no family ties between an auditor and a school.

Second, the program being evaluated must not be in a position to exercise undue influence on the evaluating entity. This means there must be no past employer relationship between the auditor and the school, and schools should rotate their auditors every five years.

Finally, the entity that evaluates an educational program's claims about outcomes must take economic risk in excess of the cost of the expected audit revenue. This means the auditor must be on the hook for material losses if it engages in wrongdoing with the audit of a school.

Conclusion

Ultimately, an outcomes-based model of accountability for alternative schools should do a few things. It should encourage schools to innovate to better serve their students. And it should give them enough breathability in the metrics on which they report that what they measure makes sense with their mission but doesn't allow them to duck from the hard task of serving students well and appropriately.

Because alternative schools are typically schools of choice (i.e., parents and students choose to attend them as opposed to attending traditional district schools), such a system would allow parents to identify which schools are best serving specific student needs so they can find the right match for their situation. That transparency will create more accountability in the system and allow regulators to compare schools serving similar populations of students with similar missions against a robust set of metrics. And it would allow researchers to better correlate short-term measures with longer-term outcomes to improve our causal understanding of what leads to success for whom.

About the Author

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Notes

1. James L. Woodworth et al., *Online Charter School Study*, Stanford University, Center for Research on Education Outcomes, 2015, https://credo.stanford.edu/sites/g/files/sbiybj6481/f/online_charter_study_final.pdf.

2. For example, see ProPublica's 2017 analysis of alternative charter schools. ProPublica, "'Alternative' Education: Using Charter Schools to Hide Dropouts and Game the System," February 21, 2017, https://www.propublica.org/article/alternative-education-using-charter-schools-hide-dropouts-and-game-system.

3. Jessica Kannam and Madison Weiss, *Alternative Education in ESSA State Plans: A Review of 38 States*, American Youth Policy Forum, June 2019, https://www.aypf.org/wp-content/uploads/2019/06/Alternative-Education-in-ESSA-State-Plans-A-Review-of-38-States.pdf.

4. Kannam and Weiss, *Alternative Education in ESSA State Plans*.

5. See Massachusetts Department of Elementary and Secondary Education, *Accountability Plan Guidelines*, 2021, https://www.doe.mass.edu/charter/acct.html?section=guidelines; Massachusetts Department of Elementary and Secondary Education, "Accountability and Assistance System Overview," November 20, 2018, https://www.doe.mass.edu/accountability/; and US Department of Education, *Massachusetts Consolidated State Plan Under the Every Student Succeeds Act (ESSA)*, August 24, 2017, 61, https://www2.ed.gov/admins/lead/account/stateplan17/maconsolidatedstateplan.pdf.

6. Boston Day and Evening Academy, *Boston Day and Evening Academy: A Horace Mann Public Charter School, Annual Report for School Year 2018*, July 27, 2018, https://bdea.com/wp-content/uploads/2018/09/BDEA_Annual-Report_2018.pdf.

7. For example, see Jessica Shopoff, "When Virtual Twins Virtually . . . Aren't: CREDO's Incomplete Methodology," June 7, 2019, http://blog.k12.com/thought-leadership/when-virtual-twins-virtually-arent-credos-incomplete-methodology/.

8. Kannam and Weiss, *Alternative Education in ESSA State Plans*.

9. See Education Quality Outcomes Standards, website, https://eqos.org/.

10. Education Quality Outcomes Standards, "Quality Assurance Standards Based on Real-World Results," https://eqos.org/our-method.

11. Michael B. Horn, "How to Get Blended Learning Right," *Forbes*, November 13, 2014, http://www.forbes.com/sites/michaelhorn/2014/11/13/how-to-get-blended-learning-right/.

12. See Curriculum Associates, "i-Ready Assessment," https://www.curriculumassociates.com/products/i-ready/i-ready-assessment.

13. Michael B. Horn, "Harnessing Benefits, Reining In Downsides of Virtual Schools," Christensen Institute, August 25, 2016, https://www.christenseninstitute.org/blog/harnessing-benefits-reigning-in-downsides-of-virtual-schools/; and Sonu Wasu, "Families of Students Who Faced Bullying Switching to Online Schools," KNXV-TV, April 10, 2019, http://news.stridelearning.com/families-of-students-who-faced-bullying-switching-to-online-schools/.

14. This approach takes the popular tool of a net promoter score, which is based on a 10-point scale, and modifies it slightly.

15. See Panorama Education, website, https://www.panoramaed.com/.

16. See Mastery Transcript Consortium, website, https://mastery.org/.

17. Sarbanes-Oxley Act of 2002, Pub. L. No. 107-204, https://www.govinfo.gov/content/pkg/PLAW-107publ204/pdf/PLAW-107publ204.pdf.

18. Ehud Kamar, Pinar Karaca-Mandic, and Eric Talley, "Sarbanes-Oxley's Effects on Small Firms: What Is the Evidence?," in *In the Name of Entrepreneurship?: The Logic and Effects of Special Regulatory Treatment for Small Business*, ed. Susan M. Gates and Kristin J. Leuschner (Santa Monica, CA: RAND Corporation, 2007), https://www.jstor.org/stable/10.7249/mg663emkf.12.